

ORIGINAL

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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Federal Communications Commission
Office of Secretary

In the Matter of)

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Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

To: The Commission

PETITION FOR RECONSIDERATION

Sangre de Cristo Communications, Inc., licensee of Television Station KOAA(TV), NTSC Channel 5, Pueblo, Colorado ("SCC"), by its attorneys, and pursuant to 47 C.F.R. § 1.429(a) (1996), hereby petitions the FCC for reconsideration of its Sixth Report and Order in the above-captioned proceeding^{1/} for the reasons described below.

SCC fully supports the principles underlying the Commission's DTV Table of Allotments as released in the Sixth R&O. SCC, however, is requesting reconsideration of the Commission's Sixth R&O as it pertains to KOAA(TV)'s DTV channel assignment. Specifically, SCC requests that the Commission reconsider its decision to use KOAA's existing transmitter site for its DTV allotment.

^{1/} Sixth Report and Order, MM Docket No. 87-268, FCC 97-115 (released April 21, 1997) ("Sixth R&O").

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KOAA's Transmitter Site Coordinates Should Be Modified.

One of the Commission's goals in developing stations' DTV operating parameters was to ensure that stations could compete effectively to provide DTV service in their markets.

Sixth R&O ¶ 88. The Commission also stated that it wanted to provide "as much flexibility as possible with regard to changes in transmitter locations." Id. ¶ 102. SCC agrees with the Commission on each of these points. KOAA has already identified the transmitter site from which it plans to broadcast DTV on its assigned DTV Channel 27. In the Pueblo-Colorado Springs, Colorado market, there is an existing antenna farm located on Cheyenne Mountain from which SCC has preliminarily determined KOAA could broadcast on Channel 27.^{2/} This site is the logical choice for KOAA because it would allow the station to maximize its DTV service to the Pueblo and Colorado Springs communities and to compete on an even footing with other television stations licensed to the same market and broadcasting from the same site. Representative coordinates for that site are: 38-44-43.3 N. Latitude, 104-51-41.3 W. Longitude.

Based upon the foregoing, SCC requests reconsideration of the Commission's Sixth R&O in this proceeding to the extent KOAA's DTV coordinates are the station's existing

^{2/} Included in Exhibit A hereto are maps which depict KOAA's proposed DTV coverage from the Cheyenne Mountain site. SCC notes, however, that the Commission has not yet released OET Bulletin No. 69 which will be necessary for SCC to assess more completely the feasibility of operations on Channel 27 from Cheyenne Mountain. Accordingly, to the extent that SCC's analysis of its channel assignment changes as a result of its calculations using OET Bulletin No. 69, SCC will supplement this petition with further engineering studies.

tower coordinates. SCC requests that the Cheyenne Mountain coordinates above be used instead.

Respectfully submitted,

SANGRE DE CRISTO COMMUNICATIONS, INC.

By: Kevin F. Reed
Kevin F. Reed
Elizabeth A. McGeary

Its Attorneys

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June 13, 1997

EXHIBIT A

Engineering Statement of Cohen, Dippell & Everist

ENGINEERING STATEMENT
IN SUPPORT OF
PETITION FOR RECONSIDERATION
MM DOCKET 87-268
ON BEHALF OF
CORDILLERA COMMUNICATIONS, INC.
KOAA-TV, PUEBLO, COLORADO

JUNE 1997

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) ss
District of Columbia)

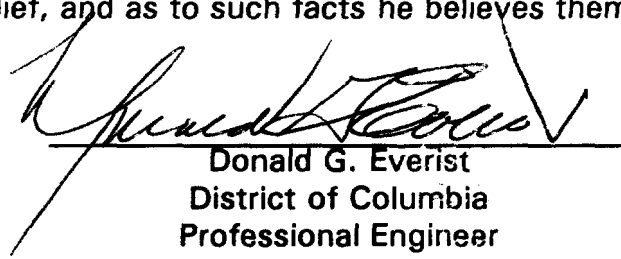
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

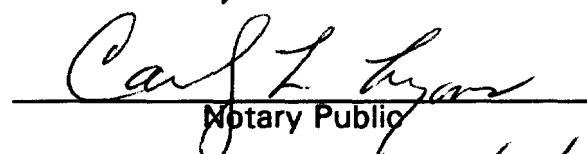
That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.



Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn to before me this 13th day of June, 1997.



Notary Public

My Commission Expires: 2/28/98

This engineering statement has been prepared on behalf of Cordillera Communications, Inc. ("Cordillera"), parent company of the licensee of Station KOAA-TV, Pueblo, Colorado [NTSC Ch. 5].

This statement is in support of a Petition for Reconsideration of the Sixth Report and Order, and Fifth Report and Order, MM Docket No. 87-268¹ ("collectively, the Report and Order") by the Federal Communications Commission ("Commission").

In addition to identifying concerns regarding the potential impact of the Commission's decisions in the Sixth Report and Order, the FCC is specifically requested to reconsider and amend its DTV allotment table contained in Appendix B of the Sixth Report and Order in regard to the DTV allotment for KOAA-TV, as discussed below.

**PETITION FOR RECONSIDERATION FOR
KOAA-TV, PUEBLO, COLORADO**

Cordillera has studied moving its planned DTV operations to Cheyenne Mountain near Colorado Springs. Based upon the studies conducted to date without the benefit of OET Bulletin 69, it is found that DTV Ch. 27 can be relocated to Cheyenne Mountain. To date, studies indicate that both service to the principal community of Pueblo, Colorado, and interference protection is rendered. The coordinates for Cheyenne Mountain are:

¹MM Docket No. 87-268, "In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service," adopted April 3, 1997.

North Latitude: 38° 44' 43.3"

West Longitude: 104° 51' 41.3"

An antenna center of radiation at a height above ground of 98 meters and 2966 meters AMSL is proposed. The elevation above average terrain is 2251.2 meters and the antenna HAAT is 715 meters.

Implementation of DTV service for KOAA-TV on Cheyenne Mountain rather than at Pueblo, Colorado, will be more effective and will facilitate early implementation by KOAA-TV. For these reasons, it is requested that the Commission reconsider and amend the DTV Table in Table 1 of Appendix B of the Report and Order to specify a DTV channel for KOAA-TV with the specifications listed in the preceding paragraph.

